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Vice President
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May 7, 1996

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Mr. William F. Caton
Acting Secretary
Federal Communications Commissions
1919 M Street, N.W.
Room 222
Washington, D.C. 20554

Re: CC 96-98 Implementation of the Local Competition Provisions in the Telecommunications Act of 1996 and CC 95116 and RM 8535, In the Matter of Local Number Portability

Dear Mr. Caton:

On May 6 Mr. Thomas Tauke, Mr. Frank Gumper, Mr. Casimir Skrzypczak and I met with Chairman Hundt, Mr. J. Farrell, Mr. E. Maxwell, Mr. R. Welch, Mr. A. Fishman, Mr. R. Metzger, Mr. J. Schlichting, Mr. R. Pepper and Mr. L. Atlas of the FCC to discuss the above proceedings. NYNEX presented its views as outlined below. You will also find attached charts used in the discussion.

Re: CC 96-98 Implementation of the Local Competition Provisions:

- **Core Belief: NYNEX and FCC'S Goals are the same.**

1. Total commitment to implementing the letter, intent and spirit of the 1996 Communications Act as rapidly as possible.

2. Creating customer choice through competition in all aspects of communications and information services: local telephone, long distance, CATV, internet services, etc.

3. Maintaining and improving the quality, reliability and availability of services to the customer both during the transition and in the new competitive industry.

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Core Belief: A manageable and pragmatic implementation process is needed to achieve these goals.

1. The focus should be on identifying those elements, interconnection points and functions that are most important to facilitate the creation of local competition in the near term as opposed to conceptual discussions of what every potential element, point or function might be. We should focus on realizing the objectives of the Telecommunications Act of 1996 not on legalistic attempts to create lists of every possible operational implication. As with most rules and regulations, experience in the market place is the only way to find out what makes sense from a customer service and operational perspective. The sooner the industry begins operating in the new mode, the faster the real needs will become apparent and the faster the real customers of the industry will experience the benefits.

2. NYNEX will not engage in unproductive arguments about the "technical feasibility" of particular unbundled elements, interconnection points or access to network functionality. Presuming that no one will ask us to change the laws of physics, any conceivable element or interconnection point can be created given enough time and resources. The real issues are the quality of the service provided, the operational practicality and the pragmatic ability to administer the arrangement in a real, competitive business environment. Those who want to delay and obstruct the implementation of the act will focus on technical arguments. Those who share our commitment to expediting the implementation will focus on how to provide capabilities now.

NYNEX Core Beliefs:

The network is designed as an integrated whole. There are "natural" interconnection points that have been designed to support service provisioning activity: e.g., MDF, Customer Network Interface, DSX bays. At these points, interconnection can be provided quickly and supported with minimal additional OSS functionality.

Other places that appear to be interconnection points like feeder/distribution cabinets or local distribution Service Access Interfaces are actually logistical management points where large cables and facilities are divided and branched for distribution to smaller areas. These points were designed to be used during the plant construction process and not to support on demand access to service. They are also sized and engineered for a precise dedication of capacity between the larger and smaller facilities.

While interconnection at these other points is technically possible, each situation must be looked at in light of operational concerns, accessibility, security, reliability, etc. What might be possible in one location may not be available in another due to a mix of hardware, vintages of equipment, available space, etc.

Given these core beliefs, NYNEX urges the FCC to adopt a two stage approach to implementing the unbundling and interconnection provisions of the ACT.

1. Establish a **Minimum Initial Set** that will meet the bulk of the interconnectors' requirements and allow real, effective competition at the local level in the shortest possible time.

2. Establish a well defined process for identifying, negotiating and satisfying additional needs on an individual interconnector and situation basis. This will allow us to meet specific interconnector needs without causing mass disruption in existing systems and processes.

General principles for selecting the initial minimum set

For simplicity, the unbundled network elements/ functions can be divided into three broad categories: access transport (e.g. customer access links), network switching, and network routing and control (e.g., signaling, AIN)

Access Transport:

A minimum set should exploit the natural interconnection points of the network: MDF, DSX, customer Network Interface.

Transport must be defined in terms of the supported service functionality not physical make up.

Illustration: "POTS" loop

Clearly, the most basic unbundled element required is an access link from an individual customers premises to the MDF to support basic voice telephone service. Such a link might physically be composed of a number of segment of copper cable of different gauges. It might have a DS0 channel of a digital carrier system as part of it. It might have load coils or range extenders or other voice transmission devices on the link to meet the design requirements for voice telephony, fundamentally a 300-3000 khz transmission channel. It would be impractical and counterproductive to try to account for all of this physical variability in defining the unbundled link element. The simple pragmatic definition is that it is a link from point A to point B and supports voice telephone service.

Clearly customers and service providers use POTS links in many ways. They put modems on them, burglar alarms and even ISDN terminal adapters. These applications may or may not work depending on the particular physical make-up of the link. To insure that the service application is supported both initially and over time as we repair and modernize our plant, we will define additional categories of unbundled links that support specific service applications. As we maintain and evolve our plant we will insure that the specified service capabilities are supported over these links.

Network Switching:

NYNEX believed that our port approach as defined in NY satisfied the need but the NPRM seems to suggest that some other unit of switch unbundling is needed. Frankly, we are having difficulty understanding what it might be. The switch is a shared resource that provides real time connection functionality in response to demand. Beyond the ports of the switch it is hard to define a measurable, administrable unit of switch to unbundle. It is also not clear what a service provider would do with this "element" that did not involve first "attaching" it to a port.

Network Routing and Control:

These elements should be defined in terms of functionality not the physical interface points by which the functionality is delivered.

We will work with the industry to define reasonable and operationally supportable points of interconnection to deliver requested network functionality in the most effective manner.

Suggested initial set of unbundled network elements:

1) Basic Links (MDF-NI)
2) Premium Links
3) Ports*-local, tandem, line, trunk, STP
4) Switching
5) Switching Features
6) Local & Interoffice Transport

*Ports are necessary to access the switch.

Conclusion:

The FCC should focus its efforts on establishing a set of interconnection points and unbundled network elements which will allow for rapid introduction of competition for local exchange services, which can meet the vast majority of interconnectors' requirements based on actual, not hypothetical, market needs and economic reasonableness.

- ***CC 95116 and RM 8535 In the Matter of Local Number Portability***

NYNEX also presented an update regarding the industry status as it relates to the Local Telephone Number Portability database solution.

- The industry has reached agreement on an AIN type platform and appears to favor an LRN solution for lookup.

- Beyond that there are no answers to the many deployment and operational questions and issues that need to be addressed. For example, is every call looked up; where does the look up occur, on the originating side, terminating, or elsewhere; etc. What are the operational support systems required to be designed and installed: billing, service order processing, ongoing updates, 911/E911 call lookup and handling, etc.
- Cost development and recovery will also need to be addressed and varies depending on the ultimate solutions deployed.
- The FCC should take the lead in assigning an industry forum responsibility for developing an industry timeline for addressing all issues, developing solutions and implementing them.

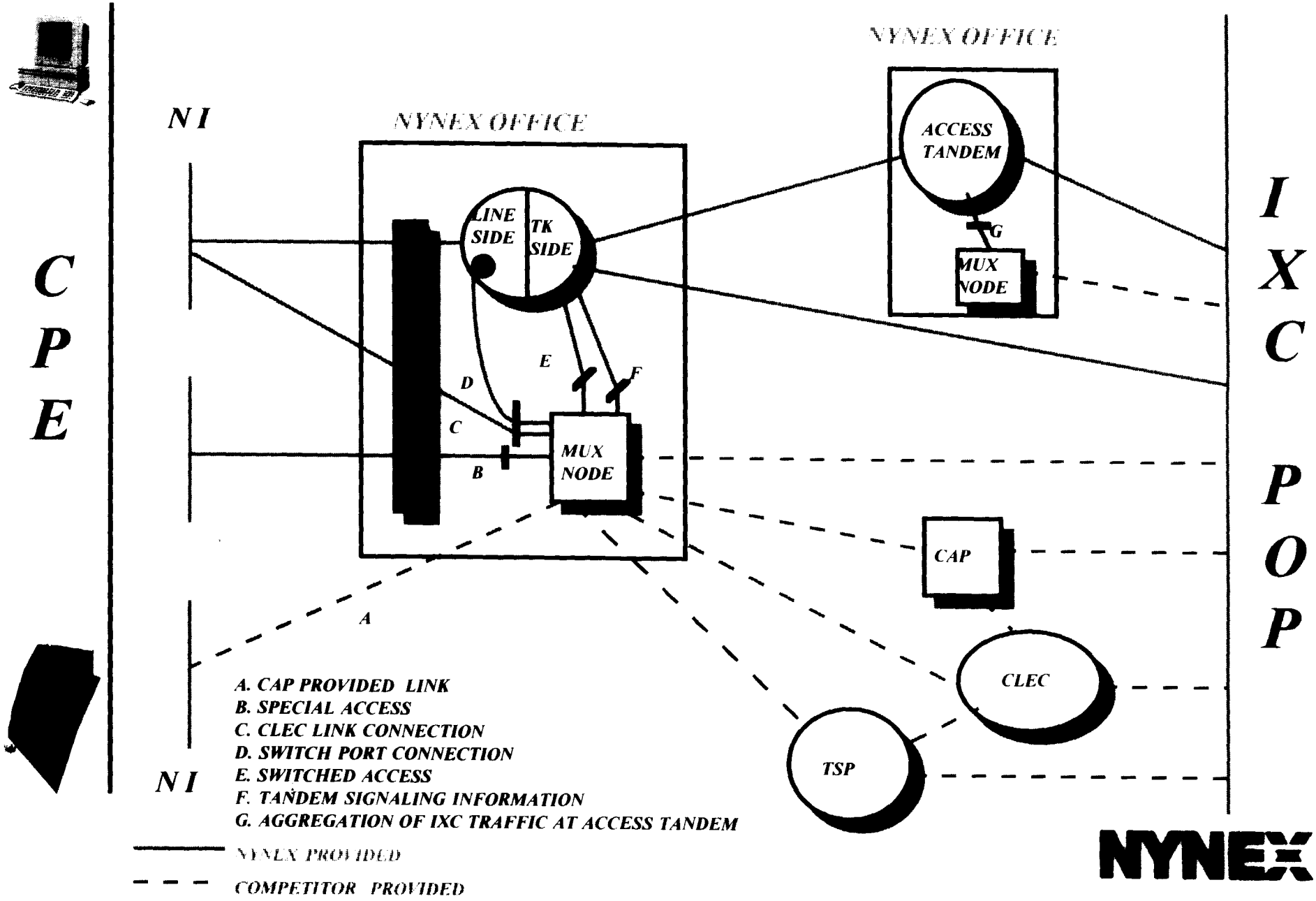
Please feel free to contact me with any questions.

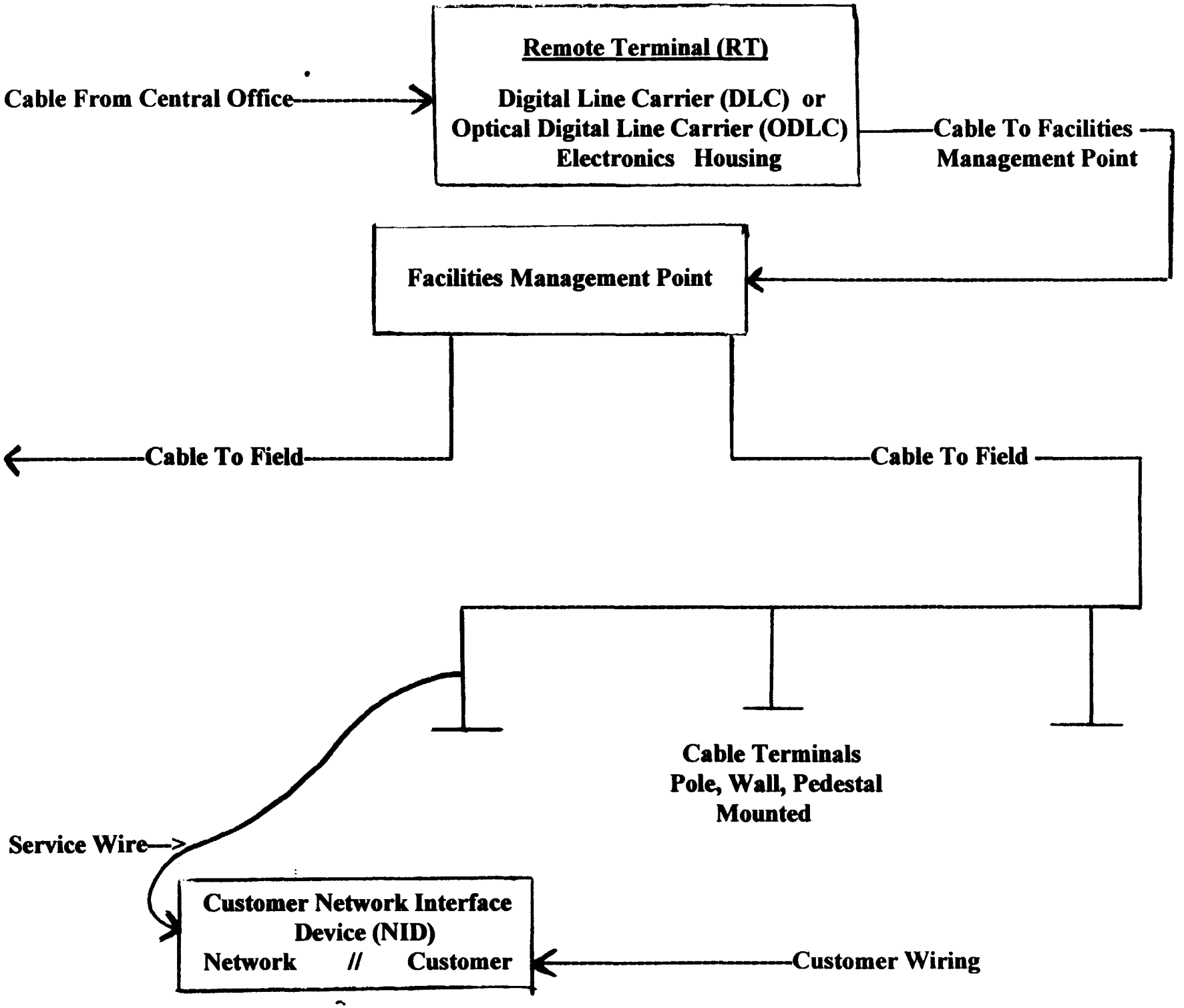
Sincerely,

Attachments

cc: Chairman Hundt
Mr. L. Atlas
Mr. J. Farrell
Mr. A. Fishman
Mr. E. Maxwell
Mr. R. Pepper
Mr. R. Metzger
Mr. J. Schlichting
Mr. R. Welch

POINTS OF INTERCONNECTION




Remote Terminal (RT)
Digital Line Carrier (DLC) or
Optical Digital Line Carrier (ODLC)
Electronics Housing
Cable From Central Office
Cable To Facilities
Management Point
Facilities Management Point
Cable To Field
Cable To Field
Cable Terminals
Pole, Wall, Pedestal
Mounted
Service Wire
Customer Network Interface
Device (NID)
Network // Customer
Customer Wiring